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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Case No. 1:22-CV-03131-DG-SJB

SHERRY PRICE
Plaintiff,

v.

BASDEO RAMPERSAD et al.,
Defendants.

_____ /

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO THE HONORABLE JUDGE
BULSARA REPORT AND RECOMMENDATION**

COMES NOW, Sherry Price (“the Plaintiff”), and files this, her Motion for an Extension of Time to file her objection to the Honorable Judge Sanket J. Bulsara’s Report and Recommendation. Based on the facts set forth below, Plaintiff respectfully moves this Court for the Entry of an Order for a thirty (30) day extension of time, from the date of Plaintiff’s objection no later than 14 days from January 3, 2023.

I. INTRODUCTION AND BACKGROUND

1. On June 1, 2022, Plaintiff filed her Complaint.
2. On August 18, 2022, Defendant Basdeo Rampersad and Rajdaye Babwah filed a joint response Answer (“ANSWER”).

3. On September 12, 2022, Magistrate Judge Sanket J. Bulsara directed Plaintiff to respond with an Order to Show Cause for lack of subject matter jurisdiction.

4. On September 14, 2022, Plaintiff filed her Motion for Extension of Time because Plaintiff's daughter underwent brain surgery and was in recovery. In light of complications resulting from that procedure, Plaintiff's daughter subsequently required full-time care at home during recovery.

5. On December 2, 2023, Plaintiff responded to the order to show cause. Additionally, Plaintiff indicated her intention to file an Amended Complaint. Plaintiff filed her Second Amended Complaint which included the name and address of Defendant originally identified as "Jane Doe".

6. On December 15, 2020, the plaintiff's daughter underwent the combined second and third part of her three-part brain surgery. Because of additional complications resulting from this procedure, Plaintiff's daughter continues to require full-time (24/7) care and assistance, something solely provided for by the Plaintiff.

II. CONCLUSION

WHEREFORE, in view of the foregoing, the Plaintiff respectfully moves this Court for the entry of an order for a thirty (30) day extension of time, from the date she is expected to respond, to file her response to the Honorable Sanket J. Bulsara's Report and Recommendation.

Dated: January 12, 2023.

Respectfully Submitted,

Sherry Price

Digitally signed by Sherry
Price
Date: 2023.01.12 21:57:38
-05'00'

/s/ Sherry Price
Plaintiff
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